

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

UNITED STATES

V.

TIFFANY ROCHELLE CROSS

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**No. 2:19-CR-96
JUDGE GREER**

MOTION TO EVALUATE STATUS OF SEALED ORDER AND UNSEAL

COMES NOW, Sandra Jelovsek, counsel for the defendant Tiffany Cross, and respectfully moves this Honorable Court to evaluate the status of the sealed Petition and Order, Docket Number 368 in this case. The sealed Petition and Order was entered by the court on July 2, 2020. The defendant was on pre-trial release at the time but was subsequently arrested by the state on October 2, 2020 for violation of probation and has been in state custody in Sullivan County since that time. To the best of counsel's knowledge, the Sullivan County charges have been fully adjudicated with extension of the state order of probation. Counsel was informed by the Marshal today that Ms. Cross is now in federal custody by Writ.

Ms. Cross has entered a written plea agreement in the instant case and is scheduled to appear before the court by video on February 8, 2021 for her change of plea hearing.

Counsel believes that the continued lack of knowledge or information regarding the sealed Petition and Order, Docket No. 368 puts counsel at a significant disadvantage in the representation of her client.

WHEREFORE, undersigned counsel respectfully asks this court to evaluate the status of the sealed Petition and Order, Dkt. No. 368, and if possible, unseal the Petition and Order.

Respectfully submitted,

/s/ Sandra B. Jelovsek
Sandra B. Jelovsek
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CERTIFICATE OF SERVICE

I hereby certify that on this day of January 15, 2021, a true and exact copy of the foregoing Motion was filed electronically and served upon the parties of record in this case through the court's electronic case filing system.

/s/ Sandra B. Jelovsek